

***PERFORMANCE SECTION –
GOVERNMENT PERFORMANCE AND RESULTS ACT (GPRA)
REPORT***

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Performance Section - Government Performance and Results Act (GPRA) Report

The following performance report is based on the major goals and objectives from the RRB's Strategic Plan for 2003 – 2008 and its Operating Plan for Fiscal Year 2005. The indicators we developed support our mission and communicate our intentions to meet challenges and seek opportunities for greater efficiency, effectiveness, and economy.

To achieve our performance goals, the RRB holds managers accountable for achieving program results and improving program effectiveness by focusing on results, service quality, and customer satisfaction. In addition, the performance plan is used to help managers improve service delivery by requiring that they plan for meeting program objectives and by providing them with information about program results and service quality. To provide reasonable assurance that the reported performance information is relevant and reliable, performance goals have been incorporated into performance standards for managers and supervisors, monitored on an agency-wide basis, and made subject to audit by the agency's OIG.

e-Government initiatives

Over the last several years, the RRB has implemented significant automation initiatives and other improvements. Because of these accomplishments, the RRB is able to operate with reduced resources and is continuing to streamline its operations with the assistance of information technology. We believe that significant new investments in information technology and further management improvements will help us to meet or exceed our customer service goals efficiently.

We are continuing to make services available over the Internet to railroad and labor employers. The RRB has developed a new secure Internet-based Employer Reporting System (ERS) to accept reports from covered railroad and labor employers concerning employee service and compensation data. By the end of fiscal year 2004, 176 employers were using the site, representing 26 percent of total reporting employers. Nearly 2,500 forms were filed on ERS during fiscal year 2004 which reduced costs to the RRB and the employers. We have received favorable comments about the site, and employers have expressed their desire that the site include more applications.

Version 1 of the System Processing Excess Earnings Data (SPEED) system was implemented on May 17, 2004. SPEED provides a single source for both retirement and survivor annuitant earnings information. With this release, SPEED began accepting and editing earnings reports for retirement and survivor annuitants, retrieving and displaying data from previous payment files, and creating a referral for examiner handling. Earnings reports are entered into SPEED by field office and headquarters adjudication staff. Once entered and accepted by the system, a work item is generated for further examiner handling. Version 1 provides the foundation for eventual automation of adjustment actions related to an annuitant's excess earnings or last person service employment. In Version 2 of the system, implemented in October 2004, SPEED began calculating suspension months and effecting a suspension of annuity payments.

We added two new Internet MainLine Service options on the RRB's website resulting in improved service to our customers with implementation of the RUIAnet system. This system provides both on-line unemployment applications and claims for benefits effective in March and November 2004, respectively. So far, about 6 percent of claimants are choosing this on-line service.

The RRB HelpLine received 408,467 calls in fiscal year 2004, compared to 455,102 calls in fiscal year 2003. We released 1,968 Railroad Retirement Act rate letters, 1,804 replacement Medicare cards, and 2,138 service and compensation statements as a result of customer calls. A total of 104,236 callers made requests for information about local field office addresses and telephone numbers.

In another e-Government initiative, the RRB is participating in the project to create and maintain an on-line Forms Catalog at www.forms.gov. It is intended to provide citizens and businesses with a common access point to locate forms issued by the Federal government. Over 5,000 forms are now available on-line. The RRB has 36 public-use forms available in the catalog and will continue adding public-use forms to the catalog during fiscal year 2005.

Service and administrative improvements

We implemented changes to the replacement Medicare card request option on the HelpLine to access the new Medicare Correction (MEDCOR) system's Duplicate Medicare Card Request screen. This change ensures that requests for replacement cards are processed either on the same day of the request or the following business day and results in more timely delivery of the duplicate card to the customer. We put the change into production on November 14, 2004.

In September 2004, we implemented an enhanced quarterly notice to employers, Form ID-40Q. Now benefit charges and credits are given by type and more detailed information on cumulative contribution and benefit balances is provided. The revised form also provides information about employers whose cumulative figures are included in the "parent" employer's current cumulative balances. We also streamlined the annual rate notice issued each October, Form ID-40R/S, combining the rate notification and proclamation statement. A Program Letter was released to rail employers explaining the changes and defining the terms in the revised forms.

The implementation of the Health Insurance Portability and Accountability Act (HIPAA) requires that all claims for reimbursement, except for small providers under the Medicare programs, be submitted electronically beginning on October 16, 2003. Since that time, the electronic media claims submitted to Palmetto GBA, our Part B Medicare carrier, in HIPAA-compliant format has grown steadily from less than 10 percent at its inception to approximately 99 percent at the end of December 2004. In addition, the percentage of claims that are submitted electronically to Palmetto GBA has also increased from 19 percent in October 2003 to 34 percent in December 2004.

Systems security

The RRB has strengthened our situational awareness and incident response capability in several functional areas, and we have ensured that appropriate access controls are in place. In 2005, we implemented a sophisticated Intrusion Protection System to monitor the RRB network for unauthorized access. We also have a Computer Emergency Response Team in place to limit and manage the potential damage should any security breaches occur. All personal computers on the RRB network are protected by continuously updated anti-virus software and system servers are secured before being connected to the network.

The RRB has developed procedures, including a continuity of operations plan (COOP), for handling threats to the organization's data. In the event of a disaster or major disruption of RRB operations, the plan provides procedures to enable the quick recovery of the agency's essential business functions and for the timely restoration of all agency functions. We recognize that

various components of the COOP need to be updated and published. In fiscal year 2006, we plan to update two important components of the COOP: the IT Disaster Recovery Plan and the RRB Business Continuity Plan (BCP). The RRB also conducts regular disaster recovery exercises where the mainframe and network computer operating systems and major system applications are restored and tested at an off-site location.

As with improving computer security, we are also working toward being better prepared to deal with a disastrous event. Along these lines, with contractual assistance we completed a Business Impact Analysis (BIA) that identified critical business functions required to sustain mission critical operations after a disastrous event. The BIA was used to develop the RRB's BCP that was finalized in December 2003, and continuity plan training was provided to agency personnel. We continue to emphasize building safety and security procedures, in accordance with guidance from the Department of Homeland Security and OPM. Proper considerations for the safety, security, and well-being of RRB personnel are included in the Occupant Emergency Plan that was updated in May 2004.

The next page begins a consolidated presentation of our actual performance in fiscal years 2002 through 2005, followed by a discussion of our unmet performance goals and objectives for fiscal year 2004. At the time this report was prepared, we had incomplete information on our fiscal year 2005 performance. The discussion of any unmet fiscal year 2005 performance goals and indicators will be presented in next year's report.

This performance report was prepared by RRB employees.

RAILROAD RETIREMENT BOARD FY 2005 ANNUAL PERFORMANCE REPORT		2002 Actual (At \$97.6m) ^{1/}	2003 Actual (At \$99.35m) ^{1/}	2004 Actual (At \$100.7m) ^{1/}	2005 Projected (At \$102.543m) ^{2/}	2005 Actual (At \$102.543m) ^{2/}
Strategic Goal I: Provide Excellent Customer Service						
Performance Goal I-A: Pay benefits accurately and timely.						
1. Achieve a railroad retirement benefit payment accuracy rate ^{3/} of at least 99%. (Measure: % accuracy rate)	Initial recurring payments:	99.97%	99.91%	99.36%	99.00%	Data not available
	Sample post recurring payments:	99.94%	99.70%	99.92%	99.00%	Data not available
2. Achieve a railroad unemployment/sickness insurance benefit payment accuracy rate ^{3/} of at least 99%. (Measure: % accuracy rate)	Unemployment:	99.12%	98.76%	99.91%	98.00%	98.22%
	Sickness:	99.94%	100%	99.84%	98.00%	99.88%
3. Review benefit payment programs in accordance with the Improper Payments Information Act of 2002 and initiate action required under the Act. (Measure: Yes/No)		New indicator for FY 2004	New indicator for FY 2004	Completed in FY 2004	Completed in FY 2004	Completed in FY 2004
4. Achieve a railroad retirement case accuracy rate ^{3/} of at least 94%. (Measure: % of case accuracy)	Initial cases:	94.7%	93.6%	94.7%	91.0%	Data not available
	Post cases:	98.2%	96.1%	97.8%	94.0%	Data not available
5. Achieve a railroad unemployment/sickness insurance case accuracy rate ^{3/} of at least 97%. (Measure: % of case accuracy)	Unemployment:	98.1%	98.5%	99.75%	97.0%	98.04%
	Sickness:	99.5%	100%	99.25%	97.0%	99.04%
6. Railroad retirement employee or spouse receives initial annuity payment, or a decision, within 35 days of annuity beginning date, if advanced filed. (Measure: % ≤ 30 adjudicative processing days ^{4/})		N/A	N/A	N/A	92.0%	93.0%
7. Railroad retirement employee or spouse receives initial annuity payment, or notice of denial, within 65 days of the date the application was filed, if not advanced filed. (Measure: % ≤ 60 adjudicative processing days ^{4/})		N/A	N/A	N/A	94.0%	97.0%
8. Survivor annuitant not already receiving a benefit receives initial payment, a decision, or notice of transfer to SSA within 65 days of the annuity beginning date, or date filed (whichever is later). (Measure: % ≤ 60 processing days ^{5/6/})		81.4%	86.0%	84.5%	80.0%	84.6%

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9. Survivor annuitant receiving benefits as spouse receives payment as survivor, notice of denial, or notice of application transfer to SSA, within 35 days of RRB receipt of the notice of employee's death. (Measure: % ≤ 30 processing days ^{5/})						91.3%	91.8%	94.1%	90.0%	93.6%
10. Applicant for any railroad retirement death benefit receives payment, or notice of denial, within 65 days of date filed. (Measure: % ≤ 60 processing days ^{5/})						96.0%	95.2%	95.4%	90.0%	96.5%
11. Unemployed railroad worker receives UI claim form, or notice of denial, within 15 days of the date application filed. (Measure: % ≤ 10 processing days ^{5/})						98.7%	100%	99.25% of cases sampled	96.0%	99.5%
12. Railroad employee unable to work due to temporary illness or injury receives SI claim form, or notice of denial, within 15 days of the date application filed. (Measure: % ≤ 10 processing days ^{5/})						99.3%	99.3%	99.4%	96.0%	99.6%
13. Railroad employee, unemployed or unable to work due to temporary illness or injury, receives a payment for unemployment or sickness insurance benefits, or a decision, within 15 days of claim receipt. (Measure: % ≤ 10 processing days ^{5/})						99.7%	99.7%	99.7%	98.0%	99.8%
14. Disabled applicant or family member receives notice of decision to pay or deny within 105 days of the date application for disability is filed. (Measure: % ≤ 100 processing days ^{5/})						53.7%	56.3%	55.9%	55.0%	64.7%
15. Disabled applicant receives payment within 25 days of decision or earliest payment date (whichever is later). (Measure: % ≤ 20 processing days ^{5/})						94.2%	94.1%	94.8%	92.0%	94.4%
16. Maintain an end-of-year normal carry-forward balance in 8 targeted workload categories. (Measure: number on hand at end of year)						5,147	3,934	4,281	11,000	4,083
17. Reduce the number of days elapsed between the date the appeal is filed and a decision is rendered. (Measure: average elapsed days)						200	181	194	200	207
Performance Goal I-B: Provide relevant, timely, and accurate information which is easy to understand.										
1. Inquirer receives answer or acknowledgment of written correspondence within 15 days of receipt. (Measure: % ≤ 10 processing days ^{5/})						98.9%	99.3%	99.3%	95.0%	98.5%
2. Achieve quality and accuracy of correspondence, publications, and voice communications. (Measure: surveys and reviews; number of valid challenges to published data)						Draft report complete as scheduled	Deferred	ACSI survey deferred	Survey has been conducted and results are being analyzed (as of July 2005)	Board Members have approved and allocated funds to conduct survey
						New indicator for FY 2003	No valid challenges to published data	No valid challenges to published data	No more than two valid challenges to published data in FY 2005	No challenges to published data

RAILROAD RETIREMENT BOARD FY 2005 ANNUAL PERFORMANCE REPORT						2005 Actual (At \$102.543m) ^{2/}	2005 Projected (At \$102.543m) ^{2/}
3. Maintain the combined balance of unprocessed record corrections and cases requiring review for corrected tax statements below the end-of-year normal working level. (Measure: number on hand at end of year)						235 (On hand as of 3/31/05)	1,200
2002 Actual (At \$97.6m) ^{1/}						93	891
2003 Actual (At \$99.35m) ^{1/}						New indicator for FY 2005	12 services available
2004 Actual (At \$100.7m) ^{1/}						New indicator for FY 2005	15 services available
2005 Actual (At \$102.543m) ^{2/}						14 services available	
Performance Goal I-C: Provide a range of choices in service delivery methods.							
Performance Goal I-D: Ensure efficient and effective business interactions with covered railroad employers.							
1. Improve timeliness and efficiency in posting service and compensation data to agency records. (Measure: % of service and compensation records posted by April 15)						New indicator for FY 2005	New indicator for FY 2005
2. Improve accuracy in posting service and compensation data to agency records. (Measure: % of service and compensation records posted accurately)						New indicator for FY 2005	New indicator for FY 2005
3. Covered employer annual reports of employees filed electronically, or on magnetic media. (Measure: % of employee records filed electronically, or on magnetic media)						98.2%	97.0%
4. Enable employers to use the Internet to conduct business with the RRB, in support of the Government Paperwork Elimination Act. (Measure: % of employers who use the new online reporting process; # of services available through electronic media)						New indicator for FY 2003	52% 4 Internet services available
5. Resolve problem situations with covered employers timely and appropriately. (Measure: % of reported problems resolved within 90 days)						New indicator for FY 2005	New indicator for FY 2005
Strategic Goal II: Serve as Responsible Stewards for Our Customers' Trust Funds and Agency Resources							
Performance Goal II-A: Ensure that trust fund assets are projected, collected, recorded and reported appropriately.							
1. Debts will be collected through billing, offset, reclamation, referral to outside collection programs and a variety of other collection efforts. (Measure: funds collected vs. total debts outstanding)						64%	69%
						55%	50%

RAILROAD RETIREMENT BOARD FY 2005 ANNUAL PERFORMANCE REPORT						2005 Actual (At \$102.543m) ^{2/}	2005 Projected (At \$102.543m) ^{2/}	2004 Actual (At \$100.7m) ^{1/}	2003 Actual (At \$99.35m) ^{1/}	2002 Actual (At \$97.6m) ^{1/}	
2. Release quarterly and annual notices accurately and timely to employers regarding their experience rating-based contributions. (Measure: Yes/No)											
3. Complete compensation reconciliations at least 1 year before the statute of limitations expires. (Compensation reconciliations involve a comparison of compensation reported by railroad employers to the RRB for benefit calculation purposes with compensation reported to the IRS for tax purposes.) (Measure: % completed)											
4. Perform monthly reasonableness tests comparing railroad retirement taxes deposited electronically, which represent over 99 percent of all railroad retirement taxes, against tax receipts transferred to the RRB trust funds by the Department of the Treasury (Treasury) to provide reasonable assurance the RRB trust funds are receiving appropriate tax funds. (Measure: reasonableness test performed and anomalies reconciled with Treasury (Yes/No))											
5. Prepare annual Performance and Accountability Reports (including audited financial statements and other financial and performance reports) by the required due dates. (Measure: Yes/No)											
6. Take prompt corrective action on audit recommendations. (Measure: % of audit recommendations implemented by target date)											
Performance Goal II-B: Ensure the integrity of benefit programs.											
1. Achieve a return of at least \$3.60 for each dollar spent on program integrity activities. (Measure: \$ recoveries & savings per \$ spent)											
2. Maintain active wage matches with all 50 States to ensure the accuracy of benefit payments. (Measure: # of States matching)											
3. Ensure ongoing entitlement to disability by conducting continuing disability reviews. (Measure: # of continuing disability reviews on hand at the end of year does not exceed normal working balance. (Yes/No))											

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Performance Goal II-C: Ensure effectiveness, efficiency, and security of operations.									
1. Continue succession planning by ensuring there is a cadre of highly skilled employees available for key positions. (Measure: Number of position types (descriptions) for which core competencies have been defined. Number of employees whose skills have been assessed. Number of employees involved with skills-enhancement programs.)					New indicator New indicator New indicator	New indicator New indicator New indicator	1 position 39 employees 18 employees	1 position 43 employees 43 employees	4 positions 64 employees 25 employees
2. Annually assess/update all computer security, disaster recovery, and business resumption plans for the agency. (Measure: Yes/No)					New indicator for FY 2005	New indicator for FY 2005	Assessment and updates of all scheduled plans completed.	Yes. The agency will perform necessary assessments to verify the validity of the contingency solution policies and controls for those operational plans designated for the year that do not require contractual assistance.	Yes. The agency has completed a Business Impact Analysis and a Business Continuity Plan. A target date of 6/30/05 has been set for completion of an IT Disaster Recovery Plan.
3. Develop and implement new procedures for responding to and reporting computer security incidents. (Measure: Yes/No)					New indicator for FY 2005	New indicator for FY 2005	Procedures have been developed, and reports of identified incidents are documented. The RRB also purchased an Intrusion Detection System (IDS).	Yes. Funding will be sufficient to allow for activation and calibration of the IDS, and intrusion detection at the network level. Funding will not be sufficient to allow for auditing individual system logs to detect signs of unauthorized activity.	Yes. The Intrusion Detection System (IDS) was installed on 11/19/04, and was placed in operation on 2/12/05. The IDS is now in a tuning phase that is scheduled for completion by 6/30/05. Computer security incident procedures are in place and reports of incidents are documented.

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4. Assess computer security training requirements and implement an ongoing training program for agency staff. (Measure: Yes/No)	New indicator for FY 2005	New indicator for FY 2005	Yes. Training needs were assessed and a security curriculum was developed based on audit findings. An ongoing awareness training program for computer users at the agency was completed with 100% participation by agency personnel.	Yes. Based on assessed needs, agency staff with significant information technology security responsibility will be enrolled in a security training program based on roles and responsibilities, relative to major applications and general support systems.	Yes. The agency has established two training tracks as of 5/20/05. Track one provides technical expertise and functional skills for IT technical staff, and track two focuses on knowledge of security assessments, planning, policy development and safeguard controls. All employees requiring IT security education participate in track two; however, technical employees use both tracks.
5. Implement a methodology to successfully estimate, track and monitor total costs and time schedules for information technology investments through the project life cycle, incorporating both web and mainframe investments. (Measure: Yes/No)	New indicator for FY 2005	New indicator for FY 2005	New indicator for FY 2005	30% completion. Multi-phase project begun. A pre-pilot phase of the project using limited resources is ongoing. Pilot phases will follow into the next fiscal year depending on available resources.	20% has been completed as of 5/20/05. A multi-phase project has begun. A pilot phase of the project using limited resources is ongoing. Additional pilot phases will follow into next fiscal year depending on available resources.
6. Assemble and publicize an annual inventory of RRB commercial activities on the RRB Website. (Measure: Yes/No)	Yes	Yes	Yes	Yes	Yes
7. Complete public-private competitions on the required activities listed on the Federal Activities Inventory Reform (FAIR) Act inventory. (Measure: % of the FTE's listed on the FAIR Act inventory for which competitions completed)	5%	5% (cumulative)	5% (cumulative)	Meet target level established by OMB	5% (cumulative)
8. Meet government percentage goal for use of performance-based contracting techniques for eligible service contract funds. (Measure: Yes/No)	New indicator for FY 2005	New indicator for FY 2005	New indicator for FY 2005	Yes	Yes
9. Support government-wide procurement of e-Government initiatives using the point of entry vehicle of www.FedBizOpps.gov for all eligible actions. (Measure: Yes/No)	New indicator for FY 2005	New indicator for FY 2005	New indicator for FY 2005	Yes	Yes

RAILROAD RETIREMENT BOARD FY 2005 ANNUAL PERFORMANCE REPORT					
Performance Goal II-D: Effectively carry out the responsibilities of the Railroad Retirement Board under the Railroad Retirement and Survivors' Improvement Act of 2001 with respect to the activities of the National Railroad Retirement Investment Trust.					
	2002 Actual (At \$97.6m) ^{1/}	2003 Actual (At \$99.35m) ^{1/}	2004 Actual (At \$100.7m) ^{1/}	2005 Projected (At \$102.543m) ^{2/}	2005 Actual (At \$102.543m) ^{2/}
1. Review monthly reports submitted by the Trust. (Measure: Yes/No)	New indicator for FY 2004	New indicator for FY 2004	Yes	Yes	Yes
2. Review annual management reports submitted by the Trust. (Measure: Yes/No)	New indicator for FY 2004	New indicator for FY 2004	Yes	Yes	Yes
3. Review annual audit reports of the Trust's financial statements. (Measure: Yes/No)	New indicator for FY 2004	New indicator for FY 2004	Yes	Yes	Yes

^{1/}

Dollar amounts shown are funds obligated or appropriated for the fiscal year.

^{2/}

Actual results for fiscal year 2005 represent status as of 3/31/05 unless otherwise noted. Dollar amounts shown are funds appropriated for fiscal year 2005.

^{3/}

Payment Accuracy Rate – the percentage of **dollars** paid correctly as a result of adjudication actions performed.

Case Accuracy Rate – the percentage of **cases** that do not contain a material payment error. Case accuracy rates reflect only those errors that are detected as a result of reviewing award actions performed during the fiscal year being studied. (A material error is (1) an incorrect payment of \$5.00 or more at the point the error is identified, (2) an incorrect payment of less than \$5.00 totaling 1 percent or more of the monthly rate, or (3) any situation in which a non-entitled benefit is paid.)

^{4/}

In a recent audit (05-05, dated May 17, 2005), the OIG found problems with the performance data for these indicators. For that reason, we are not reporting performance for prior years. One significant problem has been resolved, allowing us to report performance for the current year. However, there are still some system limitations that prevent inclusion of all internal processing time in the performance data. We are addressing these issues. See the discussion of key performance indicators for further information.

^{5/}

Measure does not include the time for customer receipt (from the Department of the Treasury or United States Postal Service).

^{6/}

We have recently become aware of inconsistencies in the way we measure the timeliness of this indicator that have resulted in understating our performance. See discussion of Key Indicator 6.

Discussion of Unmet Performance Goals and Indicators for Fiscal Year 2004

<p>Performance Indicator I-A.1. Achieve a railroad retirement benefit payment accuracy rate of at least 99%. (Measure: percent accuracy rate)</p> <p>Our goal for fiscal year 2004 was 99.80%. We achieved a level of 99.36%.</p>	<p>In the fiscal year 2004 review, we identified a range of monthly payment errors from a high of \$1,495 to a low of \$2. The variability in our sample error dollar amounts impacts our recurring payment accuracy rate. Twenty-one (or 5.9%) of the 354 cases reviewed in our study had material errors. Of these 21 cases, the 3 cases with the highest dollar error amounts (less than 1% of the overall sample and 14.3% of the erroneous cases) comprised 75% of the total erroneous amounts. The high-dollar value of these 3 cases resulted in the RRB achieving a payment accuracy of 99.36%, short of the fiscal year 2004 target 99.80%. Recognizing the uncertainties caused by the variability in our payment amounts, we reduced the payment accuracy goal for fiscal year 2005 from 99.80% to 99.00%.</p>
<p>Performance Indicator I-A.14. Disabled applicant or family member receives notice of decision to pay or deny within 105 days of the date the application for disability is filed. (Measure: percent processed in 100 days or less, plus 5 days for handling by the U.S. Treasury or U.S. Postal Service)</p> <p>Our goal for fiscal year 2004 was 65.0%. We achieved a level of 55.9%.</p>	<p>We did not meet our performance target for this goal because of (1) implementation of a new automated disability decision rationale form, which created a learning curve during its several implementation phases, and (2) use of a new contractor for specialized medical examinations with the inherently time-consuming start-up delays and closure of the previous contract. Timeliness data through the first half of fiscal year 2005 shows marked improvement in this area.</p>
<p>Performance Indicator I-A.17. Reduce the number of days elapsed between the date the appeal is filed and a decision is rendered. (Measure: average elapsed days)</p> <p>Our goal for fiscal year 2004 was 180 days. We achieved a level of 194 days.</p>	<p>During fiscal year 2004, the Bureau of Hearings and Appeals diverted resources to updating the RRB's regulations. The reduced resources available for hearing appeals prevented meeting this objective.</p>
<p>Performance Indicator I-B.3. Maintain the combined balance of unprocessed record corrections and cases requiring review for corrected tax statements below the end-of-year normal working level. (Measure: number on hand at end of year)</p> <p>Our goal for fiscal year 2004 was to achieve an end-of-year balance of 500 or less. Our actual balance as of September 30, 2004 was 891.</p>	<p>Computer-generated referrals are received and worked each month. However, the volume of referrals received in September 2004 was unexpectedly high: 1,923 compared with 1,662 in the previous year. About 600 of these referrals were received on September 7, and approximately 130 on September 15. We do not expect a recurrence of this situation.</p>

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